

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

VS.

CAUSE NO. 3:22-cr-109-DPJ-FKB-1

TERRY GRASSAREE

DEFENDANT

FOURTH MOTION FOR CONTINUANCE

COMES NOW, Defendant Terry Grassaree, through counsel and files this Fourth Motion for Continuance and would show as follows:

1. The Grand Jury returned an Indictment against Grassaree on October 5, 2022 alleging a violation of 18 U.S.C. § 1952(a)(3). The Clerk issued a Summons. Grassaree voluntarily appeared and was arraigned on November 22, 2022. He was allowed pretrial release. On December 15, 2022, this Court's Order [18] granted Defendant's First Unopposed Motion for Continuance [17] and rescheduled the Pretrial Conference for January 19, 2023 and Trial for February 6, 2023. On January 27, 2023, this Court's Order [22] granted Defendant's Second Unopposed Motion for Continuance [21] and rescheduled the Pretrial Conference for March 23, 2023 and Trial for April 3, 2023. Pretrial discovery was not complete and the Court also granted Defendant's Unopposed Motion for Extension of Time to Comply with Discovery Order [19] and extended the discovery deadline by Text Only Order for 30 days. On March 22, 2023, this Court's Order [28] granted Defendant's Third Motion for Continuance [25] and rescheduled the Pretrial Conference for May 25, 2023 and Trial for June 5, 2023.

2. Grassaree and counsel still have not had adequate opportunity to completely review or fully prepare a defense, due to the voluminous discovery furnished by the Government, constituting well over 4M kilobytes of electronic information and somewhat unsorted. Good faith negotiations were made with the Government to "bates number" the discovery for ease of reference. The Government agreed to do so and completed that task and transmitted it to defense

counsel, who received it on March 27, 2023. Continued time is needed to complete a review of these documents/media. Further, the time needed for filing of any motions after completion of the review of that discovery, is now insufficient given present deadlines scheduled. Counsel for defendant anticipates the need to file such motions, possibly including motions to suppress. Counsel for defendant anticipates the need to assemble certain medical records of the defendant and issue subpoenas for pretrial production of certain evidence. A Motion for Order Requiring Bill of Particulars [20] was filed previously and has been row resolved by the court, which hopefully will narrow the continued review by counsel and a potential expert witness for Defendant.

3.Grassaree has been advised of his right to a Speedy Trial under 18 U.S.C. §3161 within 70 days of arraignment and is fully aware of the fact that he waives that right for any days that will not be deducted therefrom, should the Court grant this Motion. This Motion is not filed merely for the purpose of delay, but for justice to be done.

4. Counsel for Grassaree also represents he has undertaken, and will continue attempts to contact counsel opposite for the Government to determine any opposition to this motion, and will so inform the court.

WHEREFORE, PREMISES CONSIDERED, Grassaree would respectfully request this court enter an order accordingly, re-setting the trial date to a future date and all other deadlines.

Respectfully submitted, this the 5th day of May, 2023.

TERRY GRASSAREE,
DEFENDANT

BY: s/ Gary Street Goodwin
GARY STREET GOODWIN,
HIS ATTORNEY

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CERTIFICATE OF SERVICE

I, the undersigned, Gary Street Goodwin, attorney of record for Terry Grassaree, Defendant do hereby certify that I have electronically filed the foregoing document with the Clerk of this Court using the ECF system which will send notification of such filing to all counsel who have electronically registered with the Court in this cause:

So certified, this the 5th day of May, 2023.

s/ Gary Street Goodwin
GARY STREET GOODWIN